

## EXHIBIT 16

TO MAO DECLARATION ISO  
PLAINTIFFS' MOTION FOR  
ATTORNEYS' FEES, COSTS, AND  
SERVICE AWARDS



when the parties executed the Stipulation and Agreement of Settlement, Compromise, and Release. The table prepared below breaks down Quinn Emanuel's hours and lodestar as of December 22, 2022, and (except where noted) at their current hourly billable rates:<sup>1</sup>

<b>Timekeeper Name</b>	<b>Position</b>	<b>Hours</b>	<b>Hourly Rate</b>	<b>Lodestar</b>
William C. Price	Partner	19.6	\$2,030	\$39,788
David Cooper	Partner	828.1	\$1,525	\$1,262,853
Rollo C. Baker IV	Partner	18	\$1,395	\$25,110
Silpa Maruri	Partner	1,384.80	\$1,320	\$1,827,936
Chad Johnson <sup>2</sup>	Former Partner	171.7	\$1,250	\$214,625
Dominic J. Pody	Associate	964	\$1,245	\$1,200,180
James Meehan	Former Associate	857.8	\$1,210	\$1,037,938
George T. Phillips	Associate	2,808.20	\$1,170	\$3,285,594

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<sup>1</sup> This lodestar table conservatively omits time billed by summer associates and Quinn Emanuel attorneys, paralegals, and support staff who billed less than 15 hours on this Action.

<sup>2</sup> Messrs. Johnson and Mandel departed Quinn Emanuel for Robbins Geller Rudman & Dowd LLP ("Robbins Geller") in the summer of 2019, where they and Robbins Geller thereafter served as Additional Counsel for the Class. *See* Trans. IDs 64081937 & 66359058. Quinn Emanuel has included their time and lodestar up until June 31, 2019, based on their hourly rates listed in Quinn Emanuel's leadership affidavit. *See* Trans. ID 63053875.

<b>Timekeeper Name</b>	<b>Position</b>	<b>Hours</b>	<b>Hourly Rate</b>	<b>Lodestar</b>
William R. Sears <sup>3</sup>	Partner	1,750.20	\$1,135	\$1,986,477
Christine J. Chen	Associate	512.6	\$1,110	\$568,986
Peter Collins	Associate	114.5	\$1,100	\$125,950
Noam Mandel <sup>2</sup>	Former Associate	379.5	\$865	\$328,268
Sarah Kern	Attorney	346.4	\$535	\$185,324
Frank Masterson	Attorney	254.3	\$535	\$136,051
Kathyann Small	Paralegal	272.7	\$455	\$124,079
<b>Totals:</b>		<b>10,682</b>		<b>\$12,349,159</b>

5. Quinn Emanuel’s reputation as one of the nation’s leading firms in the field of complex commercial litigation, on both sides of the “v.,” is detailed in its leadership affidavit. *See* Trans. ID 63053875. Quinn Emanuel recently was once again ranked as the “most feared law firm” in the nation in the field of litigation, and it is consistently ranked as one of the nation’s top litigation firms.<sup>4</sup>

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<sup>3</sup> Mr. Sears was elected partner in December 2022. Quinn Emanuel has calculated his time and lodestar based on his final hourly rate as an associate.

<sup>4</sup> *See, e.g.,* BTI Consulting Grp., *The 46 Firms Most Feared in Litigation* (Oct. 5, 2022) (“For the 3rd time in the last 4 years, Quinn Emanuel earns the coveted number 1 spot among the BTI Fearsome Foursome.”), <https://bticonsulting.com/themadclientist/the-46-firms-most-feared-in-litigation>; Sue Reisinger, *The 4 Law Firms That GCs Most Hate To Face In Court*, Law360 (Oct. 6, 2022) (“Quinn Emanuel has made the Fearsome list for the past five years and missed it only twice since 2013.”), <https://www.law360.com/articles/1537516/the-4-law-firms-that-gcs-most-hate-to-face-in-court>.

6. Courts across the country, including the Court of Chancery, have repeatedly and consistently held that Quinn Emanuel’s hourly rates are reasonable. *See, e.g., H&N Mgmt. Grp. v. Couch*, 2019 WL 6620822, at \*6 (Del. Ch. Dec. 4, 2019) (Montgomery-Reeves, V.C.) (in a shareholder derivative case, finding that attorneys’ fees requested by Quinn Emanuel and co-counsel, including certain of its co-counsel in this Action, were “fair and reasonable”); *Rudi v. Wexner*, 2022 WL 1682297, at \*5 (S.D. Ohio May 16, 2022) (“The Court finds that [Quinn Emanuel’s] hourly rates are reasonable under the circumstances of this particular [contingency] case. Accordingly, this factor weighs in favor of granting the requested fee.”); *Proofpoint, Inc. v. Vade Secure, Inc.*, 2020 WL 7398791, at \*3 (N.D. Cal. Dec. 17, 2020) (finding that Quinn Emanuel attorneys “are experienced and seasoned practitioners; that they are employed at a large international firm with a highly regarded reputation; that they have highly specialized ... backgrounds”; and that the firm’s fees are reasonable).

7. The work performed in this Action by Quinn Emanuel attorneys, paralegals, and other support staff included, among other things:

- a. Investigating the claims underlying this Action, including by conducting a books-and-records investigation before Plaintiff filed its initial complaint;

- b. Preparing and filing five complaints averaging more than 140 pages apiece;
- c. Briefing and arguing multiple motions to dismiss;
- d. Briefing two motions to compel;
- e. Briefing a subsequent motion to dismiss brought by defendant Goldman Sachs & Co. LLP (“Goldman”), which Goldman withdrew just nine days before the scheduled oral argument;
- f. Engaging in extensive fact discovery of the defendants and 41 third parties, including reviewing hundreds of thousands of pages of produced documents;
- g. Deposing the following witnesses:

<b>Deponent</b>	<b>Affiliation</b>	<b>Attorney</b>
Michael Dell (two-day deposition)	Defendant and Dell Technologies Inc. 30(b)(6) witness	Silpa Maruri
Gregg Lemkau (two-day deposition)	Defendant Goldman 30(b)(6) witness	Silpa Maruri
Tom Sweet	Dell Technologies Inc. 30(b)(6) witness	William R. Sears
Kyle Paster	Defendant Silver Lake Group LLC 30(b)(6) witness	William R. Sears
Stuart Francis	Evercore Inc. 30(b)(6) witness	Silpa Maruri
Courtney McBean	Evercore Inc. 30(b)(6) witness	Silpa Maruri

<b>Deponent</b>	<b>Affiliation</b>	<b>Attorney</b>
Hall Butler	Dell Technologies Inc. 30(b)(6) witness	William R. Sears
Ryan Weninger	Dell Technologies Inc. 30(b)(6) witness	George T. Phillips

h. Engaging in significant expert work and discovery, including working with one testifying expert and several consulting experts;

i. Deposing Defendants' principal expert, Dr. Glenn Hubbard, and defending the deposition of Plaintiff's expert, Mr. Benjamin A. Sacks;

j. Briefing and preparing to argue a motion *in limine* to exclude certain opinions of Defendants' principal expert's (Dr. Hubbard);

k. Mediating this Action with the Hon. Layn R. Phillips (Ret.), including the preparation of substantive opening and rebuttal mediation statements; and

l. Preparing for trial, including by preparing a joint pretrial order, a joint trial exhibits list with nearly 3,000 entries, an almost 23,000-word pretrial brief, opening-examination materials for Plaintiff's expert (Mr. Sacks), and cross-examination materials for Defendants' principal expert (Dr. Hubbard), Defendant Michael Dell, Defendant Goldman's 30(b)(6) witness Gregg Lemkau, and Dell Technologies Inc. Chief Financial Officer and 30(b)(6) witness Tom Sweet.

8. Based on records maintained by Quinn Emanuel, the total expenses that Quinn Emanuel incurred from the inception of the Action to December 22, 2022, are as follows:

<b>Cost Type Description</b>	<b>Amount</b>
Air travel	\$376.00
Air travel – Agency Fees	\$170.00
Attorney Service	\$104.31
Color Document Reproduction	\$3,130.00
Conference Fee	\$70.00
Document Reproduction	\$1,840.08
Document Services	\$48,838.11
Express Mail	\$1,330.05
Hotel	\$822.80
Lexis Courtlink – Off Contract	\$807.82
Local Business Travel (with Service Fee)	\$536.35
Local Meals	\$354.26
Meals During Travel	\$271.49
Messenger	\$634.68
OCR	\$5.76
Online Research	\$9,614.80
Online Research – Tax	\$6,408.53
Out-of-Town Travel	\$170.68



<b>Cost Type Description</b>	<b>Amount</b>
Outside Record Production	\$50.00
PACER Services	\$7.40
Litigation Fund Reimbursement for this Action	\$562,550.00
Consulting Expert Fees	\$650.00
Service of Process	\$1,214.75
Travel (with Service Fee)	\$2,848.50
Velobind	\$6.00
Video Deposition / Videotaping	\$1,344.00
Word Processing	\$699.00
<b>Total:</b>	<b>\$644,855.37</b>

9. The expenses that Quinn Emanuel incurred in this Action are reflected in the firm's books and records. These books and records are prepared from expense vouchers, check records, and other source materials. They are an accurate record of the expenses that Quinn Emanuel incurred.

Executed on: March 17, 2023



David Cooper

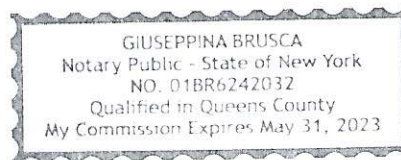
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*Co-Lead Counsel for Lead Plaintiff*

SWORN AND SUBSCRIBED before  
me on March 17, 2023



Notary Public



**CERTIFICATE OF SERVICE**

I, Ned Weinberger, hereby certify that, on March 20, 2023, I caused a true and correct copy of the foregoing to be served on the following counsel via File & ServeXpress:

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/s/ Ned Weinberger  
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